

JAMES J. PISANELLI, ESQ.
Nevada Bar No. 4027
PISANELLI BICE PLLC
400 South 7th Street, Suite 300
Las Vegas, NV 89101
Telephone: (702) 214-2100
Facsimile: (702) 214-2101
Email: jjp@pisanellibice.com

R. Jeffrey Layne, ESQ.
(Admitted Pro Hac Vice)
NORTON ROSE FULBRIGHT US LLP
98 San Jacinto Blvd., Suite 1100
Austin, TX 78701-4255
Telephone: (512) 474-5201
Facsimile: (512) 536-4598
Email: jeff.layne@nortonrosefulbright.com

*Attorneys for Defendants HealthSouth Corp.
And HealthSouth of Henderson, Inc.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA, *ex rel.*,
Joshua Luke,

Plaintiff,

v.

HEALTHSOUTH CORPORATION,
HEALTHSOUTH OF HENDERSON INC.,
KENNETH BOWMAN, JERRY GRAY, and
JAYA PATEL,

Defendants.

Case No.: 2:13-cv-01319-APG-VCF

**STIPULATION AND ORDER TO EXTEND
TIME FOR DEFENDANTS TO FILE
REPLY IN SUPPORT OF MOTION FOR
PROTECTIVE ORDER**

(First Request)

Plaintiff-Relator Joshua Luke ("Plaintiff"), as relator in this action, by and through his undersigned counsel, and Defendants HealthSouth Corporation and HealthSouth of Henderson, Inc. ("Defendants"), by and through their undersigned counsel of record, hereby stipulate and agree, subject to this Court's approval, as follows:

1 1. Whereas, Defendants filed a Motion for Protective Order (Dkt. #104) in this action on
2 December 8, 2017;

3 2. Whereas, on December 20, 2017 Plaintiff responded to the Motion for Protective Order
4 and sought expenses including attorneys' fees from Defendants (Dkt. #107);

5 3. Whereas, the deadline for Defendants to reply to Plaintiff's response and request for
6 sanctions is December 27, 2017;

7 4. Whereas, Defendants asked Plaintiff to extend their reply deadline by 8 days to Thursday,
8 January 4, 2017;

9 5. Whereas, Defendants requested this extension because Plaintiff's response includes a
10 request for affirmative relief in the form of sanctions and to accommodate the Christmas holiday;

11 6. Whereas, Plaintiff without agreeing with Defendants' asserted grounds, does not object
12 to an 8-day extension.

13 The parties hereby stipulate to Defendants' Request for an extension to and including January 4,
14 2018 to file a reply brief in support of their Motion for a Protective Order.

15 This stipulation is made in good faith, is not interposed for delay, and is not filed for an improper
16 purpose. This is the first stipulation for extension of time to file this reply in support of Defendant's
17 Motion for Protective Order.

18 DATED this 21st day of December, 2017.

DATED this 21st day of December, 2017.

19 PISANELLI BICE PLLC

LAW OFFICE OF MERRIL HIRSH

20
21 /s/ James J. Pisanelli
JAMES J. PISANELLI, ESQ.
22 Nevada Bar No. 4027
400 S. 7th Street, Suite 300
23 Las Vegas, NV 89101

/s/ Merrill Hirsh
MERRIL HIRSH, ESQ. (admitted pro hac vice)
2837 Northampton St., NW
Washington, D.C. 20015

1 DATED this 21st day of December, 2017.

2 NORTON ROSE FULBRIGHT US LLP

3 /s/ R. Jeffrey Layne

4 R. JEFFREY LANE, ESQ.

5 Admitted (pro hac vice)

6 98 San Jacinto Blvd., Suite 1100

7 Austin, TX 78701-4255

8 *Attorneys for Defendants HealthSouth Corp.*
9 *And HealthSouth of Henderson, Inc.*

DATED this 21st day of December, 2017.

THORNDAL, ARMSTRONG, DELK,
BALKENBUSH & EISINGER

/s/ Craig Delk

CRAIG R. DELK, ESQ.

Nevada Bar No. 2295

1100 E. Bridger Avenue

Las Vegas, NV 89101

Attorneys for Joshua Luke

10 **ORDER**

11 IT IS SO ORDERED.

12 

13 UNITED STATES MAGISTRATE JUDGE

14 DATED: 12-22-2017

15 CASE NO.: 2:13-cv-01319-APG-VCF